

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOSE BAUTISTA,

Plaintiff

DOCKET NO.:  
CV-13-8189  
(AKH)(JCF)

-against-

THE CITY OF NEW YORK, et al.,

Defendants.  
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**DECLARATION IN SUPPORT OF FREDERICK K. BREWINGTON OF PLAINTIFF'S  
OPPOSITION TO DEFENDANTS MOTION SEEKING BIFURCATION  
AND TO RECONSIDER THE ORDER OF APRIL 17, 2015**

I, **FREDERICK K. BREWINGTON** declare under the pains and penalties of perjury, pursuant to 28 U.S.C. Section 1746, that the following statements are true and correct, to the best of my knowledge:

1. I am one of the attorneys representing Plaintiff JOSE BAUTISTA. I submit this Declaration in support of Plaintiff's Memorandum of Law and Supporting Papers in Opposition to Defendants' Motion Seeking Bifurcation and to Reconsider the Order of April 17, 2015.

2. Attached as Exhibit A is a true and accurate copy of *New York City Department of Investigation Report on the Recruiting and Hiring Process for New York City Correction Officers, January 2015*.

3. Attached as Exhibit B is a true and accurate copy of the *United States Department of Justice CRIPA Investigation of the New York City Department of Correction Jails on Rikers Island, August 2014*.

4. Attached as Exhibit C is a true and accurate copy of Plaintiff Bautista's Third Amended Complaint dated June 9, 2014.

5. Attached as Exhibit D is a true and accurate copy of a reprint from The New York Times, newspaper, *New York's Top Jail Investigator Resigns After Inquiry on Rikers Brutality*, August 22, 2014.

Dated: Hempstead, New York  
May 8, 2015

Respectfully submitted,

LAW OFFICES OF  
FREDERICK K. BREWINGTON

By:

  
FREDERICK K. BREWINGTON (FB5295)

*Attorneys for Plaintiff*

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